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19
20 **UNITED STATES DISTRICT COURT**
21 **CENTRAL DISTRICT OF CALIFORNIA**

22 YITZCHOK FRANKEL *et al.*,

23 Plaintiffs,

24 v.

25 REGENTS OF THE UNIVERSITY OF
26 CALIFORNIA *et al.*,

27 Defendants.

28 Case No.: 2:24-cv-4702

**DECLARATION OF
KAMRAN SHAMSA
IN SUPPORT OF
PLAINTIFFS' MOTION
FOR PRELIMINARY
INJUNCTION**

29 Date: July 29, 2024

30 Time: 9:00 a.m.

31 Courtroom: 7C

32 Judge: Hon. Mark C. Scarsi

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38 * admitted *pro hac vice*

1 I, Kamran Shamsa, declare and state as follows:

2 1. I am over the age of 18 and am capable of making this declaration
3 pursuant to 28 U.S.C. § 1746. I have personal knowledge of all of the
4 contents of this declaration.

5 2. I am currently an Associate Clinical Professor at UCLA. Since 2011,
6 I have been a member of the UCLA faculty in the David Geffen School of
7 Medicine and the Department of Medicine/Division of Cardiology.

8 3. Prior to joining the faculty, I completed an internship in
9 Medicine/Pediatrics in 2005, a residency in Internal Medicine/Pediatrics
10 in 2008, and a fellowship in Adult Cardiovascular Disease in 2011, all at
11 the UCLA School of Medicine.

12 4. I spent four years on the campus of UCLA as undergraduate,
13 attaining a Bachelor of Science in Physiological Science in 1998. After
14 graduation, I spent two additional years as a research associate at UCLA.
15 All in all, I have spent 27 of the past 31 years as part of the UCLA campus
16 community.

17 5. I am an observant Jew. My Jewish faith and identity are at the core
18 of who I am.

19 6. I have been alarmed and troubled by the rising wave of
20 antisemitism that has swept across UCLA's campus, as well as UCLA's
21 complicity in allowing that antisemitism to grow and thrive.

22 7. On numerous occasions, I experienced firsthand UCLA's failure to
23 protect me and other Jewish faculty and students from both the
24 exclusionary encampments, and even from direct violence.

25 8. On April 25, 2024, I attempted to enter the encampment to see what
26 was taking place inside. As I approached, I was stopped by UCLA
27 security guards stationed outside the encampment and told I could not
28 go in. Behind the security guards, a group of activists were lined up side-

1 by-side to stop anyone from the group of Jews standing outside the
2 encampment from entering the encampment. Their faces were covered,
3 and they were shouting anti-Israel and anti-Jewish epithets and slurs at
4 the Jewish crowd outside the edge of the encampment. The security
5 guards did not intervene.

6 9. In the late morning on April 28, 2024, I walked from the Ronald
7 Reagan UCLA Medical Center toward Royce Quad after finishing my
8 cardiology consultations. On the main walkway on campus called Bruin
9 Walk, I was repeatedly harassed by various activists, who were holding
10 signs and intimidating anyone that they deemed not on their side. As I
11 neared Royce Quad to attend a pro-Israel rally, a large, masked man
12 approached me and aggressively pushed me to the ground. This occurred
13 within plain sight of at least a dozen UCLA security guards. These
14 security guards all witnessed what happened to me but did nothing to
15 intervene, did not pursue my assailant, and did not make any attempt to
16 help me get up from the ground as I lay there flat on my back. As a result,
17 my assailant simply walked away, as though nothing had happened.

18 10. Shaken, I slowly rose and collected myself. After walking
19 approximately another 100 feet, a UCLA security guard approached me,
20 pushing against my chest with both hands and telling me that no one
21 could cross the plaza. It was only after I displayed my faculty badge and
22 insisted on my right to cross to the counter-protest that I was allowed to
23 proceed.

24 11. On April 30, 2024, I watched the violence at the encampment
25 unfold on social media and through local TV coverage. Appalled and
26 afraid by what I saw, I called the Los Angeles Police Department, begging
27 them to intervene. I was told by the dispatcher that LAPD could not
28

1 intervene unless requested to do so by the UCLA Administration. Then,
2 the call was abruptly ended.

3 12. I then called the University of California Police Department
4 (UCPD) three times between approximately 10:30 and 11:30 PM. I
5 explained that I was a UCLA faculty member and that police were
6 desperately needed at the encampment site to put a stop to the rapidly
7 escalating violence. I was informed that UCPD would only intervene if
8 instructed by the UCLA administration to do so. Since they had not
9 received such orders, they would not assist.

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11 I declare under penalty of perjury that the foregoing is true and correct.

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14 Executed this 9th day of July 2024.

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Kamran Shamsa